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continued on next page]*

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Management, LLC; Redwood Master Fund,  
Ltd; Redwood Opportunity Master Fund, Ltd;  
Manuel 2018, LLC; Ginogerum, LLC; and  
White-Hathaway Opportunity Fund, LLC*

16 UNITED STATES DISTRICT COURT  
17 CENTRAL DISTRICT OF CALIFORNIA

18 K.A.,

19 Plaintiff,

20 vs.

21 MINDGEEK S.A.R.L. a foreign entity; MG  
FREESITES, LTD., a foreign entity;  
22 MINDGEEK USA INCORPORATED, a  
Delaware corporation; MG PREMIUM LTD, a  
foreign entity; MG GLOBAL  
ENTERTAINMENT INC., a Delaware  
corporation; 9219-1568 QUEBEC, INC., a  
foreign entity; BERND BERGMAIR, a foreign  
individual; FERAS ANTOON, a foreign  
individual; DAVID TASSILLO, a foreign  
individual; VISA INC., a Delaware  
corporation; REDWOOD CAPITAL  
MANAGEMENT, LLC, a Delaware limited  
liability company; REDWOOD DOE FUNDS  
1-7; COLBECK CAPITAL MANAGEMENT,

CASE NO. 2:24-cv-4786

**REDWOOD  
DEFENDANTS' NOTICE  
IN RESPONSE TO THE  
COURT'S MARCH 7, 2025  
ORDER (ECF NO. 142)**

SAC filed: May 23, 2024

1 LLC, a Delaware company, COLBECK DOE  
2 FUNDS 1-3,

3 Defendants.  
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1 **NOTICE IN RESPONSE TO THE COURT'S MARCH 7, 2025 ORDER**

2 Defendants Redwood Capital Management, LLC, Redwood Master Fund, Ltd,  
3 Redwood Opportunity Master Fund, Ltd, Manuel 2018, LLC, Ginogerum, LLC, and  
4 White-Hathaway Opportunity Fund, LLC (collectively, "Redwood Defendants")  
5 have reviewed the Court's March 7, 2025 Order Regarding Omnibus Motion to  
6 Dismiss ("Order"). *See* ECF No. 142.

7 Redwood Defendants file this Notice in compliance with the Court's  
8 instruction, and consistent with the understanding of the Order, that the parties refile  
9 their Applications to Seal by March 28, 2025. Redwood Defendants narrowly  
10 tailored their Applications to Seal in connection with their Motion to Dismiss (ECF  
11 No. 69) and Reply in Support of Motion to Dismiss (ECF No. 112) (collectively, the  
12 "Applications").

13 As set forth in the Applications, Redwood Defendants sought to seal only such  
14 material that had been designated confidential, either in the litigation or by third  
15 parties (the "Confidential Material"). Redwood Defendants have an obligation to  
16 maintain the confidentiality of such information, and such disclosure could expose  
17 Redwood Defendants to potential litigation. Separately, the Confidential Material  
18 also reflects confidential business strategies and approaches to financing negotiations  
19 of Redwood Defendants and other lenders, such that good cause and compelling  
20 reasons independently exist to seal such material. Accordingly, Redwood  
21 Defendants' Applications are already narrowly tailored in accordance with the  
22 Court's Order and instruction at the March 7, 2025 hearing.

23 For the foregoing reasons, Redwood Defendants therefore maintain the  
24 Applications as previously submitted, and respectfully request that the Court grant  
25 the Applications.

1 DATED: March 28, 2025

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**PAUL HASTINGS LLP**

6 By: /s/ James M. Pearl  
7 JAMES M. PEARL

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